

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

- - - - -X

UNITED STATES OF AMERICA

:

SEALED

- v. -

:

INDICTMENT

SABIRHAN HASANOFF,
a/k/a "Tareq,"

:

S1 10 Cr.

Defendant.

:

10 CRIM.

162

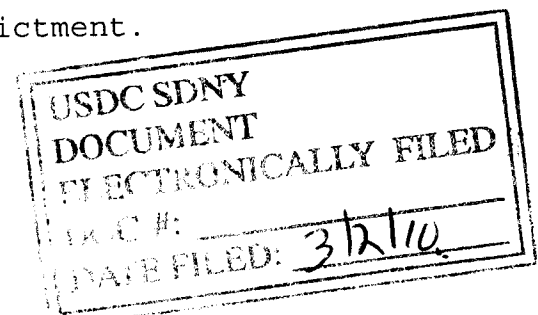
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COUNT ONE

CONSPIRACY TO PROVIDE MATERIAL
SUPPORT TO A FOREIGN TERRORIST ORGANIZATION

The Grand Jury charges:

1. From at least in or about November 2007, up to and including in or about March 2010, in an offense occurring in and affecting interstate and foreign commerce, SABIRHAN HASANOFF, a/k/a "Tareq," the defendant, who will be first brought to and arrested in the Southern District of New York, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate and agree together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, to wit, al Qaeda, which has been designated by the United States Secretary of State as a foreign terrorist organization on October 8, 1999, October 5, 2001, October 2, 2003, April 28, 2006, October 2, 2003 and is currently designated as such, as of the date of filing of this Indictment.



2. It was a part and an object of the conspiracy that SABIRHAN HASANOFF, a/k/a "Tareq," the defendant, would and did agree to provide al Qaeda with, among other things, services and currency, knowing that al Qaeda had engaged and was engaging in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act), and that al Qaeda had engaged and was engaging in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about November 28, 2007, SABIRHAN HASANOFF, a/k/a "Tareq," the defendant, a United States citizen, received approximately \$50,000 from a co-conspirator not named as a defendant herein ("CC-1").

b. In or about June 2008, HASANOFF and a co-conspirator not named as a defendant herein ("CC-2") had a discussion with CC-1 about joining al Qaeda.

c. In or about June 2008, HASANOFF instructed CC-1 not to fill his United States passport with stamps, in order to retain the passport's value to al Qaeda.

d. In or about August 2008, HASANOFF traveled to New York City and performed tasks for al Qaeda.

e. In or about June 2009, CC-1 called a consulate in New York, New York, after communicating with HASANOFF.

f. In or about July 2009, HASANOFF participated in a conversation with CC-1 and CC-2, during which they discussed seeking out additional contacts within al Qaeda.

(Title 18, United States Code,
Sections 2339B(a)(1), (d)(1)(A), (d)(1)(D) and 3238.)

FORFEITURE ALLEGATION

4. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(G), and Title 28, United States Code, Section 2461(c).

5. The violation of Title 18, United States Code, Section 2339B alleged in Count One this Indictment was a Federal crime of terrorism, as defined in 18 U.S.C. § 2332b(g)(5), against the United States, citizens and residents of the United States, and their property.

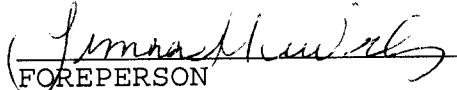
6. SABIRHAN HASANOFF, a/k/a "Tareq," the defendant, was an individual engaged in planning and perpetrating a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property.

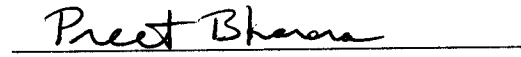
7. Upon conviction of the offense in violation of Title 18, United States Code, Section 2339B alleged in Count One of this Indictment, SABIRHAN HASANOFF, a/k/a "Tareq," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G)(i), and Title 28, United States Code, Section 2461(c), all right, title, and interest in all assets, foreign and domestic, derived from, involved in, and used and intended to be used to commit a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property.

8. Upon conviction of the offense in violation of Title 18, United States Code, Section 2339B alleged in Count One of this Indictment, SABIRHAN HASANOFF, a/k/a "Tareq," the defendant, shall pay to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G), and Title 28, United States Code, Section 2461(c), a money judgment equal to the value of the assets subject to forfeiture under Paragraphs

4 through 7 above.

(Title 18, United States Code, Section 981(a)(1)(G) and
Title 28, United States Code, Section 2461(c).)


FOREPERSON


PREET BHARARA
United States Attorney

Francis
U.S.M.G